

DUCKWORTH PETERS LEBOWITZ OLIVIER LLP
100 Bush Street, Suite 1800
San Francisco, CA 94104

THOMAS E. DUCKWORTH (SBN 152369)

(tom@dplolaw.com)

MONIQUE OLIVIER (SBN 190385)

(monique@dplolaw.com)

DUCKWORTH PETERS LEBOWITZ OLIVIER LLP

100 Bush Street, Suite 1800

San Francisco, California 94104

Telephone: (415) 433-0333

Facsimile: (415) 449-6556

TODD SLOBIN (*Pro Hac Vice*)

SHELLIST | LAZARZ | SLOBIN LLP

11 Greenway Plaza, Suite 1515

Houston, Texas 77046

Telephone: (713) 621-2277

Facsimile: (713) 621-0993

Attorneys for Plaintiffs and the proposed Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JOAN AMBROSIO, JANE LACAP, KEITH
SWICK, BILL CHAN, COSMIN BANU,
SHAHID RAHMATULLAH, DANA
ROGERS, TONY TRINH, CHRISTIAN
HALLORAN, NOVELETT WITT, ART
BAIMKIN, ANGELITO MUYOT JR.,
JASON RUIZ, KESHAV KAMATH, PEET
SAPSIN, and ALICIA ERBY

Plaintiffs,

v.

COGENT COMMUNICATIONS, INC.,

Defendant.

CLASS AND COLLECTIVE ACTION

Case No 3:14-cv-02182-RS

**STIPULATION TO CONTINUE
MOTION FOR CLASS
CERTIFICATION AND
COLLECTIVE ACTION BRIEFING
AND HEARING SCHEDULE;
~~[PROPOSED]~~ ORDER**

STIPULATION

Plaintiffs Joan Ambrosio et al. (“Plaintiffs”) and Defendant Cogent Communications, Inc. (“Defendant”)(collectively, the “Parties”), through their counsel, hereby stipulate and agree that:

WHEREAS on May 28, 2015 this Court issued an order setting forth a new class certification and hearing schedule (Dkt. 39) as follows:

July 24, 2015	Plaintiffs’ Motion for Class/Collective Certification
August 14, 2015	Defendant’s Opposition
September 4, 2015	Plaintiffs’ Reply
September 24, 2015, 1:30 pm	Hearing/Case Management Conference

WHEREAS the parties just discovered that the stipulation leading to that order contained an erroneous schedule that did not reflect the agreement of the parties;

NOW, THEREFORE, the Parties, through their respective counsel, hereby stipulate, subject to the approval of the Court, to the following (slightly modified) schedule:

July 24, 2015	Plaintiffs’ Motion for Class/Collective Certification
August 28, 2015	Defendant’s Opposition
September 25, 2015	Plaintiffs’ Reply
October 15, 2015, 1:30 pm	Hearing/Case Management Conference

Dated: June 12, 2015 DUCKWORTH PETERS LEBOWITZ OLIVIER LLP

By: /s/ Monique Olivier
 Monique Olivier
 Attorneys for Plaintiffs

Dated: June 12, 2015 HAYNES & BOONE, LLP

By: /s/ Tamara I. Devitt*
 Tamara I. Devitt
 Attorneys for Defendant

*I, Monique Olivier, attest that Tamara Devitt has concurred in the filing of this document.
 (L.R. 5-1(i).)

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, the following revised schedule for Plaintiffs' Class and Collective Certification Motion is:

July 24, 2015	Plaintiffs' Motion for Class/Collective Certification
August 28, 2015	Defendant's Opposition
September 25, 2015	Plaintiffs' Reply
October 15, 2015, 1:30 pm	Hearing/Case Management Conference

IT IS SO ORDERED.

Dated: 6/12/15


Richard Seeborg, Judge
United States District Court

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